

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JACK ARONS,
Plaintiff,
vs.

Case No. 1:10CV00326

CARDWORKS SERVICING, LLC
d/b/a PRESIDIO/CM
and

EXPERIAN INFORMATION
SOLUTIONS, INC.,
and

EXPERIAN INFORMATION
SERVICES, INC.,
Defendant.

MOTION FOR ADMISSION *PRO HAC VICE* OF JENNIFER G. BETTS

THE UNDERSIGNED, Mohammad Ghiasuddin, pursuant to M.D. Pa. LR 83.8.2.1, and as a member of the Bar of the United States District Court for the Middle District of Pennsylvania, respectfully moves that Jennifer G. Betts, an attorney with the firm of Jones Day, 500 Grant Street, Suite 4500, Pittsburgh, Pennsylvania, 15219, be admitted to appear and practice in this Court in the instant case as counsel *pro hac vice* for Defendant Experian Information Solutions, Inc. (“Experian”). In support of this motion I state:

1. Ms. Betts is especially qualified to represent Experian in this case. She has received specialized training in Experian’s policies and procedures

regarding consumer credit disputes and has particular knowledge of Experian's documents.

2. Experian's policy requires lead counsel in a consumer dispute suit to have the specialized training Ms. Betts has received.

3. Ms. Betts is a member of the Bar of the Supreme Court of the Commonwealth of Pennsylvania and the United States District Court for the Western District of Pennsylvania.

4. Ms. Betts is a member of the Bar in good standing in every jurisdiction in which she has been admitted to practice. A copy of her Affidavit in support of this motion is attached hereto.

5. There are no disciplinary proceedings pending against Ms. Betts in any jurisdiction in which she is admitted to practice, and

6. Ms. Betts is familiar with the Local Rules of the United States District Court for the Middle District of Pennsylvania.

I certify that I know that the applicant is a member in good standing of the Bar of the Supreme Court of the Commonwealth of Pennsylvania and that the applicant's private and professional character is good.

WHEREFORE, her admission is moved this 4th day of June, 2010.

Respectfully submitted,

/s/ Mohammad A. Ghiasuddin

Mohammad A. Ghiasuddin, Esq. (PA
83925)

Kaplin Stewart

Union Meeting Corporate Center

910 Harvest Drive

P.O. Box 3037

Blue Bell, PA 19422-0765

Phone: 610-941-2546

Fax: 610-684-2013

Email: mghiasuddin@kaplaw.com

Counsel for Defendant

Experian Information Solutions, Inc.

Dated: June 4, 2010

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JACK ARONS,
Plaintiff,
vs.

Case No. 1:10CV00326

CARDWORKS SERVICING, LLC
d/b/a PRESIDIO/CM
and

EXPERIAN INFORMATION
SOLUTIONS, INC.,
and

EXPERIAN INFORMATION
SERVICES, INC.,
Defendant.

ORDER

AND NOW, this ___ day of _____, 2010 upon considering the motion to admit Jennifer G. Betts as counsel *pro hac vice* for Defendant Experian Information Solutions, Inc. (“Experian”) in the above-captioned action, it is hereby ordered that Jennifer G. Betts is admitted in this case as counsel *pro hac vice* for Experian.

BY THE COURT

J.

**CERTIFICATE OF JENNIFER G. BETTS, ESQ. IN
SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

I, Jennifer G. Betts, an attorney with the firm of Jones Day, 500 Grant Street, Suite 4500, Pittsburgh, PA 15219 hereby certify, under penalties and perjury that:

- (1) I am a member of the Bar of the Supreme Court of the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the Western District of Pennsylvania.
- (2) I am a member of the Bar in good standing in every jurisdiction where I have been admitted to practice.
- (3) There are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
- (4) I am familiar with the Local Rules of the United States District Court for the Middle District of Pennsylvania.

Under penalties of perjury, this 4th day of June, 2010.

/s/ Jennifer G. Betts
Jennifer G. Betts (PA ID No. 209699)
JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219-2514
(412) 391-3939

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2010, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

Brent F. Vullings, Esq.
Warren & Vullings, LLP
1603 Rhawn Street
Philadelphia, PA 19111
Attorney for Plaintiff

Thomas W. Dymek, Esquire
Stradley Ronon Stevens & Young, LLP
2600 One Commerce Square
Philadelphia, PA 19103
***Attorney(s) for Defendant CardWorks
Servicing, LLC***

John C. McNamara, Esq.
Christie, Pabarue, Mortensen & Young
1880 John F. Kennedy Boulevard, 10th
Floor
Philadelphia, PA 19103
***Attorney(s) for Defendant Equifax
Information Services, Inc.***

/s/ Mohammad A. Ghiasuddin
Attorney for Defendant Experian
Information Solutions, Inc.